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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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King Range, JR.,
Plaintiff,
v.
Flemington Estates LLC, et al.,
Defendants

Docket No. 1:25-cv-02633-MMG

**DECLARATION OF AVRAM E.
FRISCH IN SUPPORT OF THE
MOTION**

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Pursuant to 28 U.S.C. § 1746, I, Avram E. Frisch, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the attorney for Defendant Flemington Estates LLC in this action and make this certification in Support of the motion to dismiss.
2. The defendants were previously sued for virtually identical claims in an action entitled *ALTAUNE BROWN v. FRANKIE SHOP LLC and FLEMINGTON ESTATES LLC* in the United States District Court, Southern District Of New York, Case No. 1:24-cv-5688.
3. This action was filed July 29, 2024 and the parties notified the court that the matter was settled in principal on January 31, 2025, resulting in the entry of a 45 day dismissal order.
4. This deadline was extended by the Court on March 18, 2025. The parties entered into a final agreement as of March 25, 2025.

5. Due to the fact that certain terms of the agreement are confidential, a redacted version of the settlement agreement is annexed hereto as **Exhibit A**.
6. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 18, 2025.

A handwritten signature in blue ink, reading "Avram E. Frisch".

Avram E. Frisch